

## United States District Court

DISTRICT of ARIZONA

United States of America

v.

Ryan Galal VanDyck

DOB: xx-xx-1985; United States Citizen

Janae Knight

DOB: xx-xx-1991; United States Citizen

**VICTIM**

DOCKET NO.

MAGISTRATE'S CASE NO.

15-04341MJ

Complaint for violation of Title 18

United States Code §§ 2251(a) and (e)

## COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

From at least March 2014 to on or about April 10, 2015, within the District of Arizona and elsewhere, the defendants, **RYAN GALAL VANDYCK** and **JANAE KNIGHT**, did knowingly and intentionally combine, conspire, confederate and agree with each other and other persons unknown to the grand jury to employ, use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct, as that term is defined in Title 18, United States Code, Section 2256(2), for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including a cell phone and computer, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

## BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

In May 2014, the Tucson Police Internet Crimes Against Children Unit opened an investigation on Ryan Galal VanDyck, a resident of Tucson, Arizona. A search warrant was obtained and served upon VanDyck's residence on 09/09/14. VanDyck was interviewed and admitted to possessing and distributing child pornography over a period of several years. He also admitted to being physically attracted to prepubescent children who were in their 'pre-teen' years. During a forensic preview of electronic devices located in VanDyck's home, hundreds of images and videos depicting prepubescent children engaged in sexual acts and exploitive exhibition were located. After VanDyck was arrested, his electronic devices were analyzed and a video was discovered on a Hitachi external Hard drive that depicted VanDyck setting up a camera in a bedroom of a home. A young girl ("child victim") is seen entering the room with co-defendant, Janae Knight. Knight gives the child victim clothes and she begins removing the clothes she is wearing. As she changes, Knight is seen trying to convince the child victim's younger sister leave the room. After the child victim changes clothes, she leaves the room. Knight and VanDyck are seen coming back into the room, and Knight tells VanDyck, "I totally sucked at that." She explains that she could not get the video with her phone but had the child standing in front of the camera as she got changed. VanDyck is seen obtaining the camera and the video ends.

Data from the video shows it was produced on 08/04/14 at 6:20PM.

Knight was located and interviewed on 04/08/15. Knight admitted to having met VanDyck on a Carnival Cruise in March 2014. She also indicated that she was aware of VanDyck's proclivity towards children, which he introduced to her on his second visit to see her in Boise, ID by showing her child pornography. Knight admitted that the making of the video involving the child victim was intentional, and that VanDyck asked Knight to record the child changing clothes on her cell phone, as well as on his cell phone. Knight admitted that she and VanDyck also recorded a second video involving the child victim. Knight indicated that VanDyck set-up the camera in a window in the same room. Knight was present when the video was recorded. The video showed the child victim changing clothes again. Law enforcement have not located this video. Evidence from Knight's cell phone indicates that she and VanDyck have continued to communicate about the video and sexual activity with children as recently as April 7, 2015.

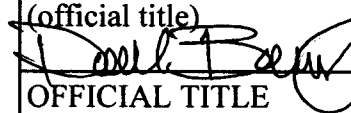
The child victim is the daughter of Knight's former roommate. At the time of the making of the video, she was 11 years old.

## MATERIAL WITNESSES IN RELATION TO THE CHARGE:

## Detention Requested

Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.

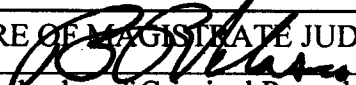
AUTHORIZED BY: AUSA CFC

SIGNATURE OF COMPLAINANT  
(official title)

OFFICIAL TITLE

Daniel Barry, Tucson Police Detective

Sworn to before me and subscribed in my presence.

SIGNATURE OF MAGISTRATE JUDGE<sup>1)</sup>DATE APRIL 10, 2015  
~~APRIL 10, 2014~~<sup>1)</sup> See Federal rules of Criminal Procedure Rules 3 and 54U.S. MAGISTRATE JUDGE  
BERNARDO P. VELASCO